

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

**ANYWHERECOMMERCE, INC.
and BBPOS LIMITED,
Plaintiffs,**

v.

**INGENICO INC., INGENICO CORP.
and INGENICO GROUP, SA,
Defendants.**

**CIVIL ACTION NO.
1:19-cv-11457-IT**

**DECLARATION OF JEFFREY K. TECHENTIN IN SUPPORT OF
DEFENDANTS' BILL OF COSTS**

I, Jeffrey K. Techentin, do hereby certify and declare as follows:

1. I am a Shareholder at Adler Pollock & Sheehan P.C. and I counsel to Defendants Ingenico Inc., Ingenico Corp., and Ingenico, SA (collectively "Ingenico") in this matter.
2. The statements set forth in this Declaration are based on my personal knowledge and from my review of the documents referenced and attached to Ingenico's Bill of Costs.
3. The costs set forth in the Bill of Costs are accurate, supported by invoices except where reimbursement is sought for in-house printing and copying, concern services that were actually performed and necessary to the presentation Ingenico's claims and defenses, and represent obligations actually incurred. The costs are reflected in the invoices attached as exhibits to the Bill of Costs.
4. Ingenico seeks reimbursement for fees for printed or electronically recorded transcripts necessarily obtained for the use in the case totaling \$39,746.02.

5. Ingenico seeks reimbursement for printing expenses totaling \$4,669.60. This figure is the product of the total number of pages of the parties' trial exhibits and a per-page cost of \$0.16. I am informed that the total number of pages of the trial exhibits identified by Ingenico was 6,085, and that two sets of the trial exhibits were printed for the reasons set forth in the contemporaneously-filed Memorandum in support of Ingenico's Bill of Costs, for a total of 12,170 pages. I am informed that the total pages for the Plaintiff's designated trial exhibits was 17,015, and that Ingenico printed a single copy of those exhibits. The total pages for all exhibits is therefore $12,170 + 17,015 = 29,185$. Applying the rate of \$0.16 per page based upon this Court's reasoning in *SiOnyx, LLC v. Hamamatsu Photonics K.K.*, 540 F. Supp. 3D, 85 (D. Mass. 2021), the total reimbursement sought is $29,185 * 0.16 = \$4,669.60$.

6. Ingenico seeks reimbursement for witness fees and expenses totaling \$16,285.81.

7. The total costs are \$60,701.43.

I declare under the penalty of perjury that the foregoing is true and correct.

/s/ Jeffrey K. Techentin

Dated: July 28, 2023

CERTIFICATE OF SERVICE

I hereby certify that on July 28, 2023, I caused to be served via electronic mail a true copy of the within document on the following counsel of record:

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/s/ Jeffrey K. Techentin

Jeffrey K. Techentin